

Donna Boehme: CCOs are voting with their feet, and that's good

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Donna Boehme in General Motors, Pilot Program, Volkswagen, Wells Fargo



I know that the compliance professionals in my networks understand, now more than ever, that **choices** have consequences.

Last May at Compliance Week 2016, I began **to hear** the impact of CCOs voting with their feet.

And a number of surveys **confirm** that compliance professionals are voting for positions that are structured to succeed, opting to apply their compliance SME to design and manage compliance programs at companies that are serious about compliance and culture, and not just seeking “window-dressing” to impress regulators, the media, and other stakeholders.

Compliance SME earned through years in the trenches and the profession is a valuable commodity, and CCOs are voting with their feet for roles and companies where they are likely to be supported in building robust, effective programs, rather than being fired, in **Mauritza Munich fashion**, for doing their jobs well. Those votes are being counted and carefully noted, by recruiters, employers and other gatekeepers. Well done EthiTweeps, way to support the profession!!

The FCPA **Pilot Program** is only one example of regulators paying closer attention to how compliance functions and programs are structured, including the “quality and experience,” “independence,” “compensation and promotion,” and “reporting structure” of compliance SMEs,” indicating that the way is being cleared for the rise of the **new model of compliance**.

As **noted** by former federal prosecutor Mike Volkov: “At the heart of the DOJ’s statement is a commitment to nurturing of the compliance function. For compliance professionals, they must have read the listing as music to their ears.” Well, it is music to *my* ears that CCOs are voting with their feet and using every opportunity to educate recruiters on the flaws of the failed Compliance 1.0 model.

And so onwards with the building of strong, successful **Compliance 2.0** programs that actually work to find, fix and prevent problems!

Compliance professionals should be focusing their efforts on these areas:

- Building their compliance subject matter expertise and networks while **supporting the profession** at every opportunity.
- Ensuring their C-Suites and Boards **are educated** in modern Compliance issues and models.

- Using all available resources and networks to build strong, effective programs that “work” to find, fix and prevent misconduct *before* your company is forced to do so on the terms of third parties, as **VW**, **GM**, and now **Wells Fargo** so vividly demonstrate.

Remember that you are **the Compliance SME** in your company, and thus responsible for developing that SME in your teams, functional partners, management, board, and others in your circle. This will help produce a stronger program, and at the same time, support the profession on many levels. Because #RisingCCOLiftsAllBoats!

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